



Federal Emergency Management Agency

Washington, D.C. 20472

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June 11, 1998

Secretary
Federal Communications Commission
Washington, DC 20554

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Reference: RM-9267, An Allocation of Spectrum for the Private Mobile Radio Services

Dear Mr. Secretary:

The Federal Emergency Management Agency (FEMA) is the lead agency for emergency planning and response activities in the Federal Government. FEMA is the Executive Agent for administering the Stafford Act, PL. 93-288 as amended, for coordinating the Federal response to catastrophic disasters. As such, FEMA is responsible for coordinating overall Federal planning for, and response to, natural disasters and most man-caused disasters in the United States. Under the provisions of Executive Order 12656, FEMA is responsible for coordinating National Security Emergency Preparedness programs and plans among Federal departments and agencies. FEMA coordinates the development of plans, in cooperation with the Secretary of Defense, for mutual civil-military support during National Security Emergencies; and in guiding and assisting state and local governments in achieving preparedness for National Security Emergencies. FEMA also establishes policy and guidance for, and provides assistance to, State and local governments in the coordination of emergency preparedness and response, recovery, and mitigation activities as well as the development and operation of telecommunications and warning systems.

A petition for Rule Making was submitted in a document dated April 22, 1998, by the Land Mobile Communications Council (LMCC). This proposal by the LMCC appears to be similar to the proposal introduced in 1996 (ISP-96-005, IWG 2A) in that UHF frequencies used by the amateur radio service are being targeted for commercial use. The particular amateur radio frequency range being targeted by the LMCC is commonly referred to as the 70 cm band and runs from 450 to 450 MHz. This band is heavily used by both the Radio Amateur Civil Emergency Service (RACES), which is sponsored by FEMA and managed by the Federal Communications Commission, and the Amateur Radio Emergency Service (ARES) program, managed by the American Radio Relay League.

Very few areas of our nation have enough communications assets to support the critical requirements during and immediately after a disaster. If they survive, the cellular, PCS and telephone systems are almost always overloaded.

The RACES and ARES programs are used to fill this critical gap. These programs are being used today to provide communications to shelters; provide communications to police and fire personnel; monitor rising flood waters; provide communications to hospitals and ambulances; report on hurricane evacuation routes; coordinate rescue activities, and hundreds of other critical functions. Without this

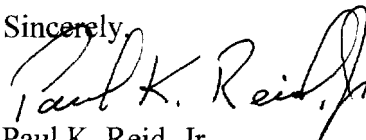
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resource, many of the communities across this great nation would be unable to effectively protect the lives and property of their citizens. FEMA has been in contact with our state and local emergency management partners throughout the nation substantiating the usage of this spectrum for emergency communications. Their input has verified the usage of this spectrum for emergency communications and how critical it is to their continued operations.

FEMA opposes the LMCC proposal for shared use of this spectrum. We do not believe that the amateur radio services could coexist on a non-interfering basis with the Private Mobile Radio Service (PMRS) without serious degradation to emergency operations that could result in the loss of lives. We strongly urge the Commission to remove this Amateur band from further consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul K. Reid, Jr.", with a stylized, cursive script.

Paul K. Reid, Jr.
Spectrum Manger